T. Steven Har (TH2601) Duane Morris LLP 1540 Broadway New York, New York 10036 (212) 692-1000 (212) 692-1020 TSHar@duanemorris.com

Attorneys for Plaintiff KEB NY Financial Corp.

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KEB NY Financial Corp.

Plaintiff,

٧.

Kye & Co Internal & Rehabilitative Medicine, PA and Kye S. Chun

Defendants.

Civil Action No. 10-CIV-5470 (RJH)

## NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

PLEASE TAKE NOTICE that plaintiff, KEB NY Financial Corp. ("KEB" or "Plaintiff"), by its undersigned counsel, Duane Morris LLP, will hereby move before this Court, Hon. Richard J. Holwell, United States District Judge, for an order pursuant to Fed. R. Civ. P. 55(b) granting plaintiff's motion for entry of default judgment in plaintiff's favor against defendants Kye &Co Internal & Rehabilitative Medicine, PA and Kye S. Chun, individually.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the Complaint filed commencing the within action, the Declaration of T. Steven Har filed simultaneously herewith,

the enclosed Clerk's Certificate, and the enclosed proof of service of the summons and complaint, in support of the within motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of default judgment has been annexed hereto.

Dated: New York, New York December 20, 2010

> DUANE MORRIS LLP Attorneys for Plaintiff, KEB NY Financial Corp.

By: <u>s/T. Steven Har</u>
T. Steven Har
1540 Broadway
New York, New York 10036
212) 692-1000
(212) 692-1020
TSHar@duanemorris.com

To: Kye &Co Internal & Rehabilitative Medicine, PA
2 East Hartshorn Drive
Milburn, NJ 07078

Kye S. Chun 2 East Hartshorn Drive Milburn, NJ 07078